

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA ON BEHALF OF ITS AGENCY) No. 15 cv 827
SECRETARY OF U.S. DEPARTMENT OF HOUSING AND)
URBAN DEVELOPMENT,)
Plaintiff)
v.) Assigned Judge:
) Edmond E Chang
WILLIAM P. BUTCHER, SPECIAL)
REPRESENTATIVE OF THE ESTATES OF JOSEPHUS) Designated Magistrate
REID, ANN REID AND CHARLES ELLISON;) Judge:
UNKNOWN HEIRS AND LEGATEES OF JOSEPH) Mary M Rowland
AND ANN REID; UNKNOWN HEIRS AND)
LEGATEES OF CHARLES ELLISON; DAVID)
MATTHEWS; KEITH ELLISON; NICOLE ELLISON;)
YVONNE ELLISON; CHARLOTTE ELLISON; TRACY)
ELLISON; CHARLES ELLISON JR; ANTWON)
ELLISON; DIONNE ELLISON; LIL NICOLE ELLISON;)
NADIA ELLISON; AMERICAN GENERAL)
FINANCIAL SERVICES OF ILLINOIS, INC.; CITY OF)
CHICAGO HEIGHTS, ILLINOIS; THORN CREEK)
BASIN SANITARY DISTRICT; AND UNKNOWN)
OWNERS AND NON-RECORD CLAIMANTS;
Defendant.)

MOTION FOR ENTRY OF JUDGMENT OF FORECLOSURE

NOW COMES, Plaintiff, UNITED STATES OF AMERICA, ON BEHALF OF ITS
AGENCY, SECRETARY OF U.S. DEPARTMENT OF HOUSING AND URBAN
DEVELOPMENT, by and through its attorneys, Potestivo & Associates, P.C., and moves
this Honorable Court, for the Entry of a Judgment of Foreclosure.

In support, attached please find Plaintiff's Affidavit of Prove-Up. (See Exhibit "1",
Affidavit).

Respectfully submitted,

ZACHARY T. FARDON

United States Attorney

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